



FOLEY & LARDNER LLP

ATTORNEYS AT LAW

111 NORTH ORANGE AVENUE, SUITE 1800
ORLANDO, FL 32801-2386
407.423.7656 TEL
407.648.1743 FAX
WWW.FOLEY.COM

WRITER'S DIRECT LINE
407.244.3236
dwatson@foley.com

CLIENT/MATTER NUMBER
641930-0006

All Redactions In This
Document Are Ex. 4 - CBI

February 9, 2021

VIA E-MAIL

Tony Ellis (DCO)
U.S EPA
1201 Constitution Avenue
EPA East Room 6428 (CBIC), 7407 Mail Code
Washington, DC 20004

Re: CONFIDENTIAL BUSINESS INFORMATION
Second Response to TSCA Section 11 Request to Inhance
Technologies dated January 14, 2021 (the "Information
Request") relating to per and poly fluorinated substances
("PFAS") regulated under the Toxic Substances Control Act
("TSCA")

Dear Mr. Ellis,

Enclosed please find Inhance Technologies' second response to the Information Request described above. The documents containing CBI information are marked as "Confidential Business Information – Inhance Technologies, LLC." Information not containing TSCA CBI information has been sent to Mark Garvey contemporaneously herewith. Should you have any challenges accessing or reviewing the attached, please reach out to me at 407-244-3236.

Sincerely,

Dorothy E. Watson

DEW:

AUSTIN
BOSTON
CHICAGO
DALLAS
DENVER

DETROIT
HOUSTON
JACKSONVILLE
LOS ANGELES
MADISON

MEXICO CITY
MIAMI
MILWAUKEE
NEW YORK
ORLANDO

SACRAMENTO
SAN DIEGO
SAN FRANCISCO
SILICON VALLEY
TALLAHASSEE

TAMPA
WASHINGTON, D.C.
BRUSSELS
TOKYO

CBI SUBSTANTIATION

General filing

Use of this form is recommended, but not required.

This Document Contains CBI: Yes ☒ NO ☐

Technical Contact: Dorothy E. Watson

Technical Contact Phone Number: 407-244-3236

Submission number (if known): [Click here.](#)

Submitting Company Name: Inhance Technologies, LLC

Information element(s) claimed as CBI *: Please identify the information element(s) that you are substantiating from the list below.

You are responsible for substantiating each information element claimed as CBI (unless that item is exempt from the substantiation requirement—see endnote 1). Any information element that is not specifically identified as subject to a confidentiality claim and substantiated as such in your response to this letter, it shall be determined that you have waived your CBI claim. If a single substantiation response applies for all information claimed as CBI, you should indicate this in your substantiation response. If different substantiation responses are necessary to support CBI claims for different information types, you should provide separate substantiation responses for each information type, clearly identifying the information for which each substantiation applies in the free text boxes (e.g. Question B) or in the additional information box at the end of this form.

**The generic template information elements and their descriptions were sourced from the Office of Pollution Prevention and Toxics' Confidential Business Information Tracking System (CBITS), a legacy Oracle database, and EPA Form No. 7710-58, "TSCA Health and Safety Study Coversheet".*

<input type="checkbox"/> Submitter	<input type="checkbox"/> Export Date
<input type="checkbox"/> Chemical	<input type="checkbox"/> Country
<input type="checkbox"/> Volume	<input type="checkbox"/> Release
<input type="checkbox"/> Use	<input type="checkbox"/> Site
<input type="checkbox"/> Plant Site	<input type="checkbox"/> Mixture
<input checked="" type="checkbox"/> Process	<input type="checkbox"/> Financial
<input checked="" type="checkbox"/> Properties	<input type="checkbox"/> Privacy
<input type="checkbox"/> Exposure	<input type="checkbox"/> Report/Study Title
<input type="checkbox"/> Envir-Release	<input type="checkbox"/> Report Study Information

☒ **Other information elements claimed as CBI** (Please list any other CBI claim or any TSCA Section 14(c)(2) assertion not listed above):

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I. REQUIRED FOR ANY IDENTIFIED CBI CLAIM

- A. Do you believe that any information element claimed as CBI is exempt from substantiation pursuant to TSCA section 14(c)(2)¹?

☒ Yes

☐ No

If you answered yes, you must identify the specific information element(s), provide the specific exemption(s) and answer no further questions. For any information element that is not exempt, please respond to all of the questions below.

If the Agency disagrees with this assertion, you may be asked to provide additional information to support your claim.

- B. Will disclosure of any information element claimed as CBI likely result in substantial harm to your business's competitive position?

☒ Yes

☐ No

(If you answered yes, please describe with specificity the substantial harmful effects that would result to your competitive position if the CBI information element is made available to the public.)

If you are claiming multiple information elements, please make sure to provide information for EACH element you identified above. If a single substantiation response applies for all information claimed as CBI, you should indicate this in your substantiation response.

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<p>C. To the extent your business has disclosed any information to others (both internally and externally), what precautions has your business taken? Please identify the measures or internal controls your business has taken to protect the information claimed as confidential.</p>	
<p>1. Non-disclosure agreement required prior to access.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>2. Access is limited to individuals with a need-to-know.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>3. Information is physically secured (e.g. locked in room or cabinet) or electronically secured (encrypted, password protected, etc.).</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<p>4. Other internal control measure(s). <i>(If yes please explain below.)</i> Click or tap here to enter text. </p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<p>D. Does any of the information claimed as confidential appear in any public documents, including (but not limited to) safety data sheet, advertising or promotional material, professional or trade publication, or any other media or publications available to the general public?</p>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p><i>(If you answered yes, please explain why the information should be treated as confidential.)</i> Click or tap here to enter text. </p>	
<p>E. Does any of the information you are claiming as CBI contain (a) trade secret(s)²?</p>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<p><i>(If you answered yes, please explain the reason for your belief and attach copies of those pages containing such information with brackets around the text that you claim to be (a) trade secret(s).)</i></p>	
<p>CBI Table 1 –provides minimum fluorination level associated with service products – is a trade secret</p>	
<p>F. If you assert a claim of confidentiality that is less than 10 years (see TSCA section 14(e)(1)(B)³), then please indicate the number of years (between 1-10 years) or specific date of which the claim is withdrawn⁴?</p>	
<p>Click or tap here to enter text.</p>	
<p>G. Has the EPA, another federal agency, or court made any confidentiality determination regarding information associated with this substance?</p>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<p><i>(If you answered yes, please explain the outcome of that determination and provide a copy of the previous confidentiality determination or any other information that will assist in identifying the prior determination.)</i></p>	
<p>Click or tap here to enter text.</p>	
<p>Additional comments:</p>	
<p>Click or tap here to enter text.</p>	

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II. REQUIRED ONLY FOR CHEMICAL IDENTITY CBI CLAIMS	
<p>A. Are you claiming a specific chemical identity as CBI?</p>	<input type="checkbox"/> Yes

<i>(If you answered yes, please respond to questions below. If you answered no, please leave all questions below blank.)</i>		<input checked="" type="checkbox"/> No
B. Is the chemical substance (or mixture) on the confidential portion of TSCA Inventory?		<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know
C. Has the chemical substance (or mixture) been offered for commercial distribution? <i>(If you answered yes, please explain why the information should be treated as confidential.)</i>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
D. Is the chemical substance known to be in US commerce? <i>(If you answered yes, please explain why the information should be treated as confidential.)</i>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
E. Would disclosure of the specific chemical name release confidential process information? <i>(If you answered yes, please explain what process information would be released.)</i>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
F. In the case of a mixture, would disclosure of the chemical name disclose a portion of the mixture comprised by any of the chemical substances in the mixture? <i>(If you answered yes, please explain what information would be released.)</i>		<input type="checkbox"/> Yes <input type="checkbox"/> No
Click or tap here to enter text.		
Additional comments: Click or tap here to enter text.		

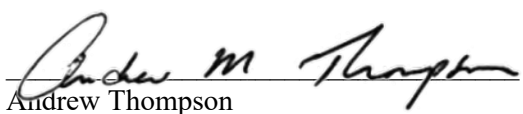
III.SUBSTANTIATION CERTIFICATION	
Do you wish to claim this substantiation as CBI?	
<i>TSCA section 14(c) requires that persons asserting a CBI claim shall certify to the validity of the claims. By the marking of a yes, you are certifying to the truth of the below statements.</i>	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
I hereby certify to the best of my knowledge and belief that all information entered on this form is complete and accurate.	

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I further certify that, pursuant to 15 U.S.C. § 2613(c), for all claims for confidentiality made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that

- (i) My company has taken reasonable measures to protect the confidentiality of the information;
- (ii) I have determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;
- (iii) I have a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of my company; and
- (iv) I have a reasonable basis to believe that the information is not readily discoverable through reverse engineering.

Any knowing and willful misrepresentation is subject to criminal penalty pursuant to 18 U.S.C. § 1001.


Andrew Thompson

Date: 2/8/21

President & CEO

Inhance Technologies LLC

¹ **“TSCA Section 14(c)(2) states:**

Information generally not subject to substantiation requirements

Subject to subsection (f), the following information shall not be subject to substantiation requirements under paragraph (3):

(A) Specific information describing the processes used in manufacture or processing of a chemical substance, mixture, or article.

(B) Marketing and sales information.

(C) Information identifying a supplier or customer.

(D) In the case of a mixture, details of the full composition of the mixture and the respective percentages of constituents.

(E) Specific information regarding the use, function, or application of a chemical substance or mixture in a process, mixture, or article.

(F) Specific production or import volumes of the manufacturer or processor.

(G) Prior to the date on which a chemical substance is first offered for commercial distribution, the specific chemical identity of the chemical substance, including the chemical name, molecular formula, Chemical Abstracts Service number, and other information that would identify the specific chemical substance, if the specific chemical identity was claimed as confidential at the time it was submitted in a notice under section 2604 of this title.

² **“Trade secret”** is defined as “a secret, commercially valuable plan, formula, process, or device that is used for the making, preparing, compounding, or processing of trade commodities and that can be said to be the end product of either innovation or substantial effort.” Public Citizen Health Research Group v. FDA, 704 F.2d 1280, 1288 (D.C. Cir. 1983).

³ **“TSCA section 14(e)(1)(B) States”**

(B) in the case of information other than information described in subsection (c)(2)—

(i) for a period of 10 years from the date on which the person asserts the claim with respect to the information submitted to the Administrator; or

(ii) if applicable before the expiration of such 10-year period, until such time as—

(I) the person that asserted the claim notifies the Administrator that the person is withdrawing the claim, in which case the information shall not be protected from disclosure under this section; or

(II) the Administrator becomes aware that the information does not qualify for protection from disclosure under this section, in which case the Administrator shall take any actions required under subsections (f) and (g).

⁴ Information with withdrawn CBI claims may be made available to the public without further notice.

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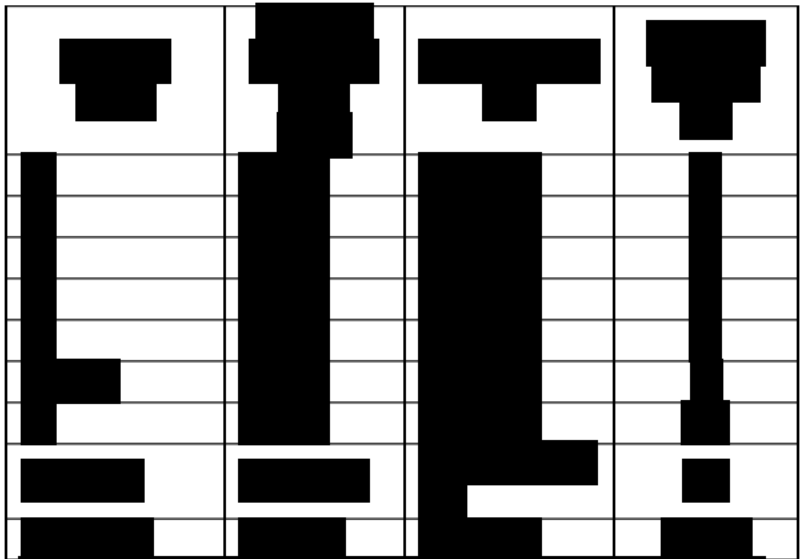
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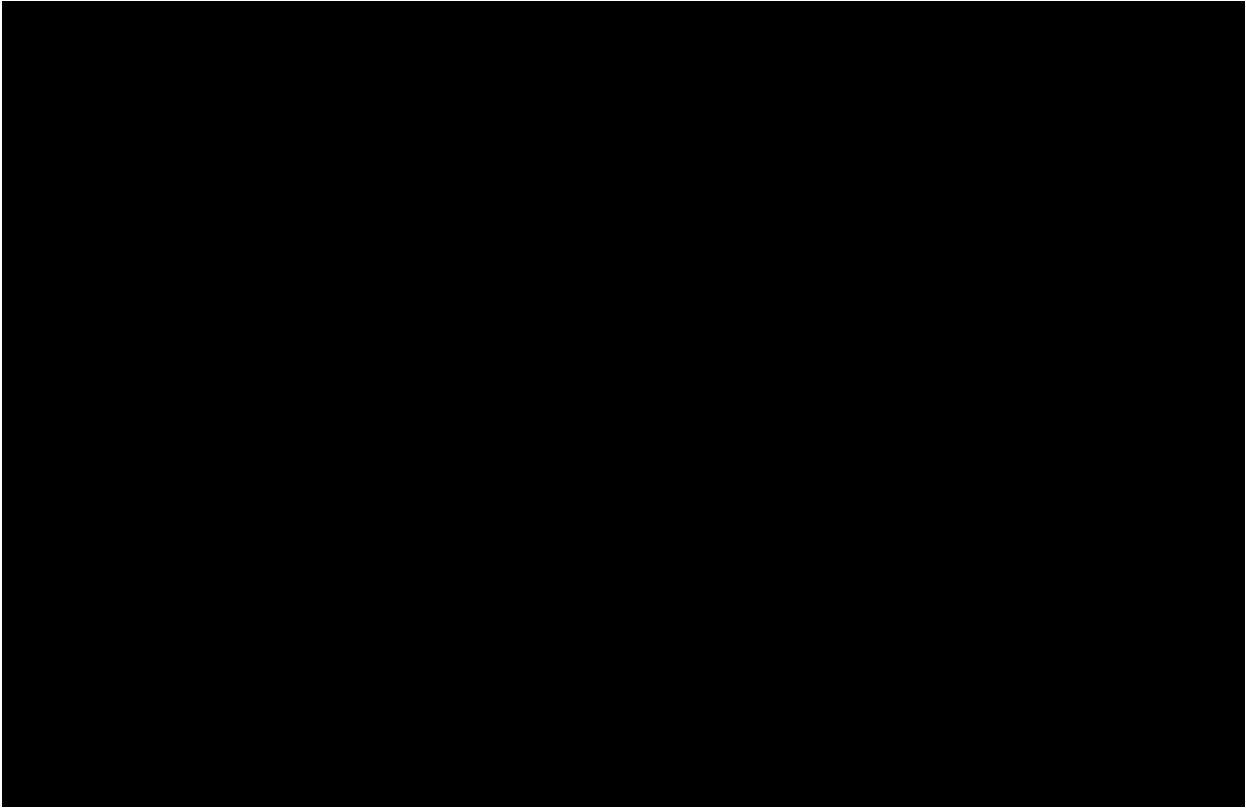


[REDACTED] mm Hg of ambient air is also added to the gas mixture to supply oxygen.

CBI Figure B

[REDACTED]

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[illegible]

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Plant Manufacturing Process Flow				
Packers	Shift Operator 1	Shipping/Receiving	Plant Asst. MGR	Post Treatment Shipping Process

[illegible]



5.2

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

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[illegible]

6 Associated and Referenced Documents

- [REDACTED]
- [REDACTED]
- [REDACTED]

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[REDACTED]

7 Release Log

Date	Changes	Rev.	Originator	Approver
5/18/2015	New Document Creation	A	N/A	Ming Chen
1/5/2016	Added New Section 6 Process Flow Chart	B	N/A	Ming Chen
07/08/2019	Addition of Blue Placard	C	Karl Diver	Brigitte Florschutz
08/19/2019	5.6 and 5.7 The use of Glad Hand Lock added as an action related to July 2019 Near Miss at Plant 11.	D	Garry Moffo	Brigitte Florschutz
12/30/2020	Converted to new document numbering and a new logo applied. No content changes. (previous number 040-P-000-7551)	D	Brigitte Florschutz	NA

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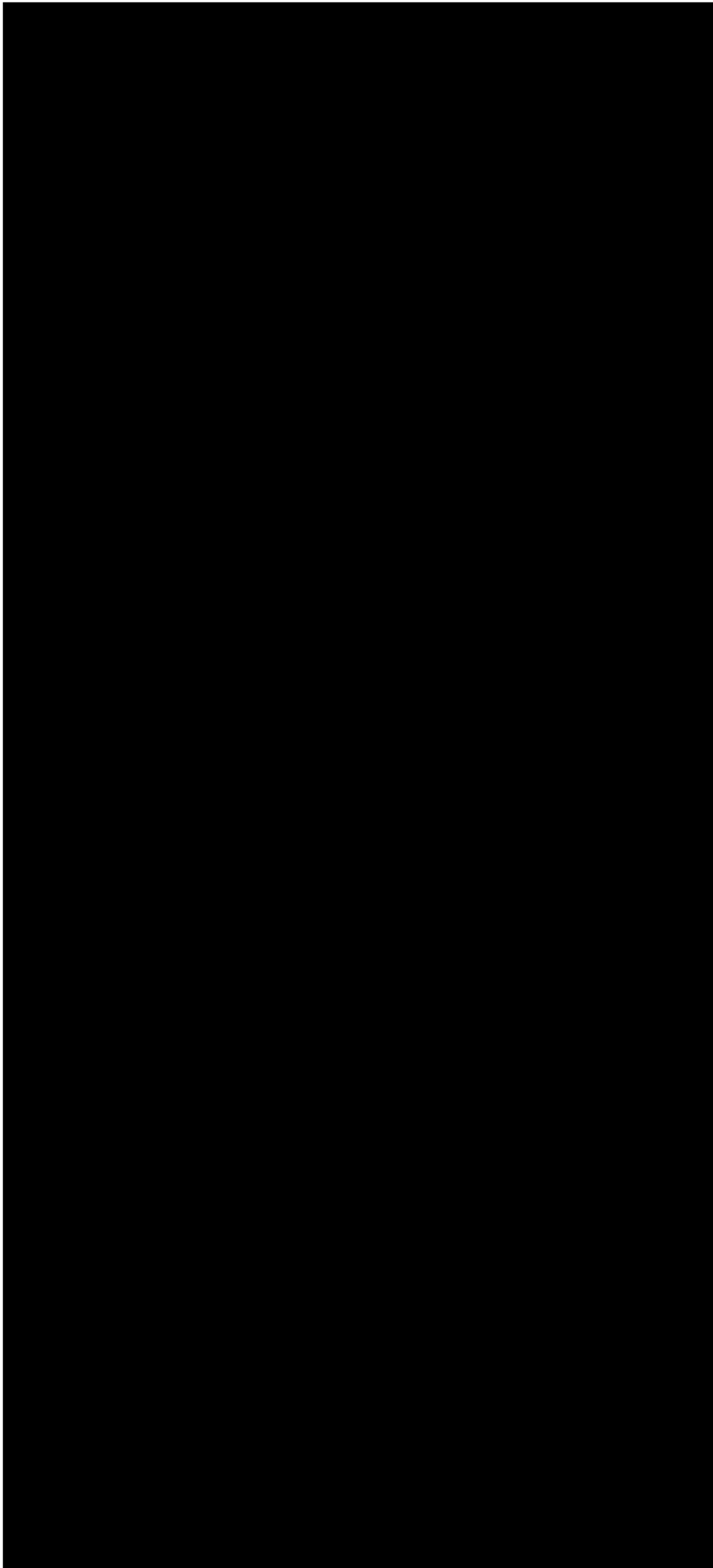
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6 Process Flow Chart

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7 Referenced Documents

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

8 Associated Records

- 050-QF-000-7538 Batch Sleeve QA Checklist
- 050-QF-000-7524 Processing Container Form
- 050-QF-000-7535 Treated Product QC Disposition Form

9 Release Log

Date	Changes	Rev.	Approved by
5/18/2015	New Document Creation	A	Ming Chen
8/17/2015	Updated Sections 5.9 and 5.10 to include the reference to "050-WI-000-7539"	B	Ming Chen
12/24/2015	Inserted new section 6 "Process Flow Chart"	C	Ming Chen
1/7/2016	Revised section 5.18.1, the "040-QF-000-7561 Ready to Ship Form" is no longer mandated.	D	Ming Chen
2/26/2016	Deleted section 5.12, updated section 5.10 and 5.11: 7535 QC Disposition form is no longer mandatory when QC passes.	E	Ming Chen
6/30/2016	Updated the procedure so that the Work Order Picklist is no longer required.	F	Ming Chen

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1 Purpose

The purpose of this work instruction is to d [REDACTED]

2 Scope

This work instruction applies to all Inhance plants, to all QC sample placement and labeling.

3 Definitions

3.1 [REDACTED]

3.2 [REDACTED]

Rodeos are outlined with contiguous lines while bottom and top baskets positions are presented with dotted.

Positions AB/AT are the closest to the reactor door.

3.3 [REDACTED]

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3.6

[REDACTED]

P [REDACTED]

[REDACTED]

3.7 CSQP – Customer specific quality procedure

4 Responsibilities

It is the responsibility of the Operations management and the plant manager to implement this procedure/work instruction at her/his site.

It is the responsibility of the employee(s) performing the tasks outlined in this procedure/ work instruction to follow the steps as described. The role(s) these tasks are typically associated with is/are a supervisor, a shift operator.

The tasks described in this work instruction can be performed by trained employees or employees in training who work under supervision.

5 Instructions

5.1

[REDACTED]

[REDACTED]

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5.3

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

N [REDACTED]

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[REDACTED]

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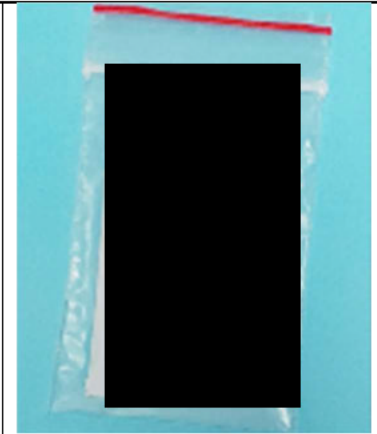
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5 [REDACTED]

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5 [REDACTED]

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6 Referenced Documents

7 Release Log

Date	Changes	Rev.	Originator	Approver
8/19/2020	New Document Creation	A	NK	NK
7/14/2016	No cutting of samples	B	Ming Chen	NK
8/19/2016	Inclusion of purchased pre-cut strips	C	Tom Gardner	NK
01/04/2021	Added pictures, clarified several instructions, changes number and position of QC samples requirements, Added maintenance weekly check section. Updated the formatting and document numbering (previous number 050-WI-000-7539) This revision and changes in it is documented in Corporate MOC 10022020-000-1_QC sampling changes	D	Brigitte Florschutz	Prakash Iyer, Bill Ostrowski, Dave Wendland, Alex Philip, Tiffany Davis

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Work Instruction

Manufacturing Protocol

050-WI-000-7320

Issue Date: 5/19/2015

Rev. A

Pg. 1 of 6

1 Purpose

The purpose of this procedure is [REDACTED]

[REDACTED]

2 Scope

This procedure applies to processes run in a standard reactor.

3 Definitions

HMI – Human Machine Interface, this computer program is used by the operator to interact with the equipment and control system for a plant. Inhance currently uses Wonderware as our HMI.

4 Protocol

S [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

4.1 [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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4. [Redacted]
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4.2.3 [REDACTED]

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4.3.1

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4.4 [Redacted]

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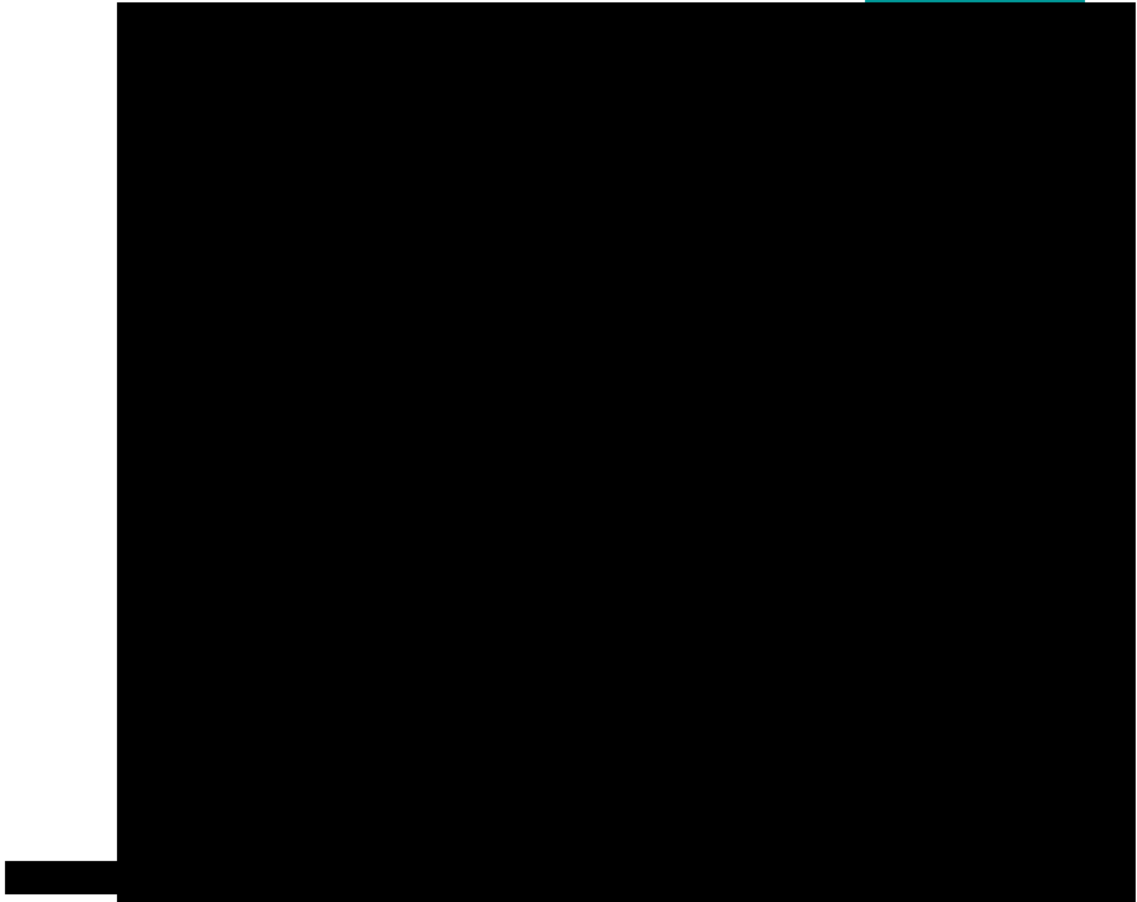
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5 Release Log

Date	Changes	Rev.	Approved by
5/19/2015	New	A	Ming Chen



1 Purpose

The purpose of this procedure is to provide [REDACTED]
[REDACTED]

2 Scope

[REDACTED]

3 Definitions

N/A

[REDACTED]

Plant managers are responsible to implement and enforce the procedure with their employees and are responsible for the product quality released from their plant.

Plant managers are responsible to conduct a monthly FTIR performance verifications and to electronically save performance records or designate another employee to perform this task.

5 Description of Activity

5.1 [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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5.2

[REDACTED]

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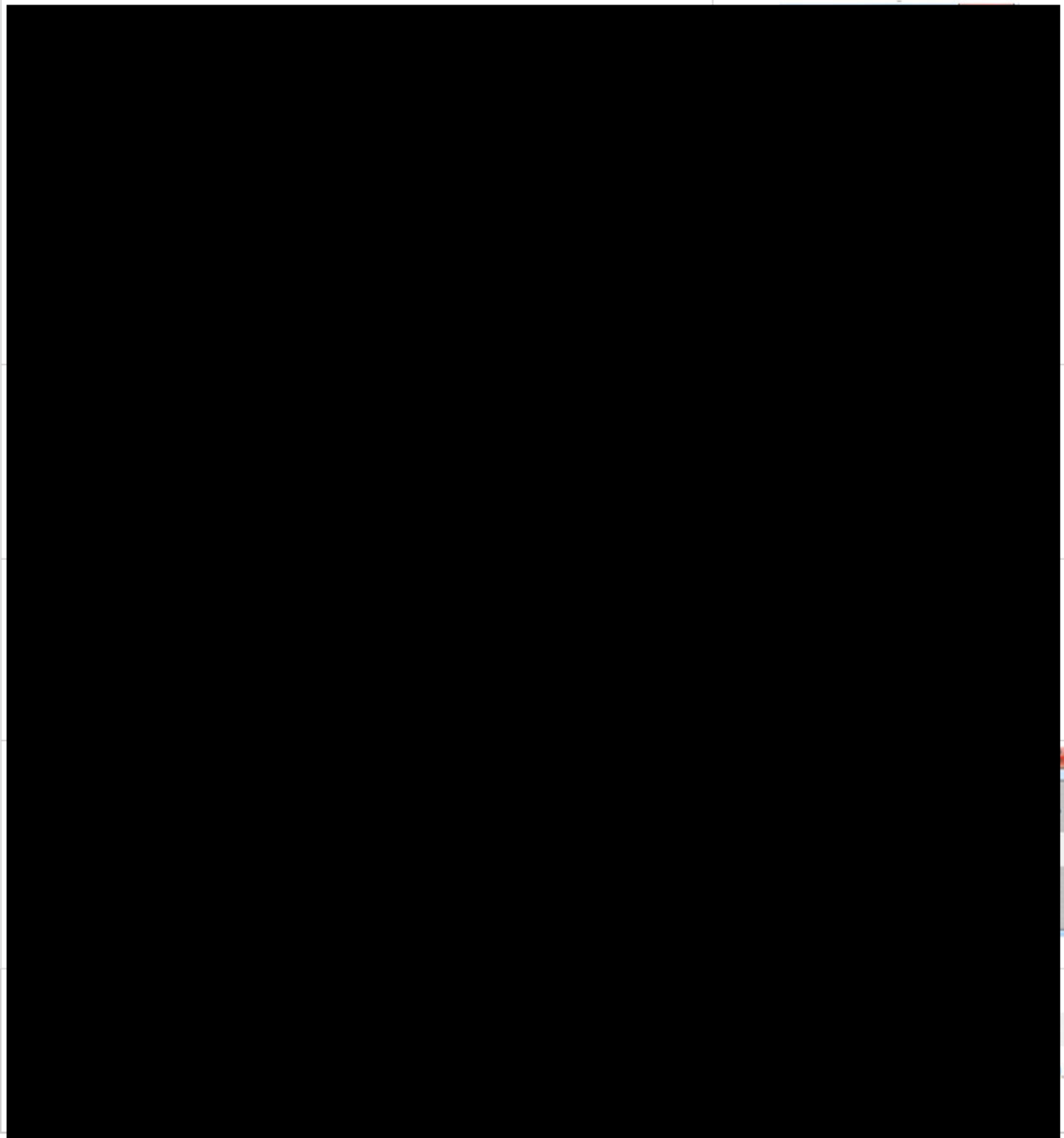
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NOTE: Ware may be released for packaging and shipping only if both, oxygen number and sample ratio (fluorinating level) passed the requirements.

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than 95



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[illegible]

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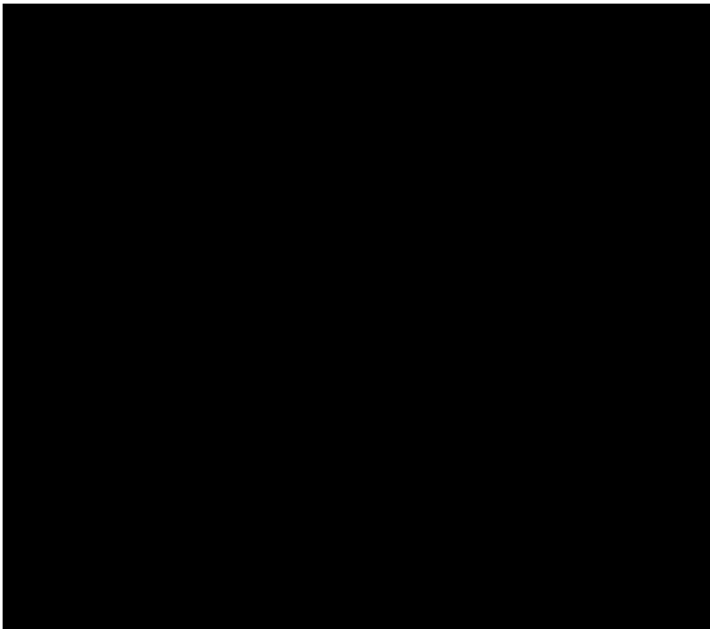
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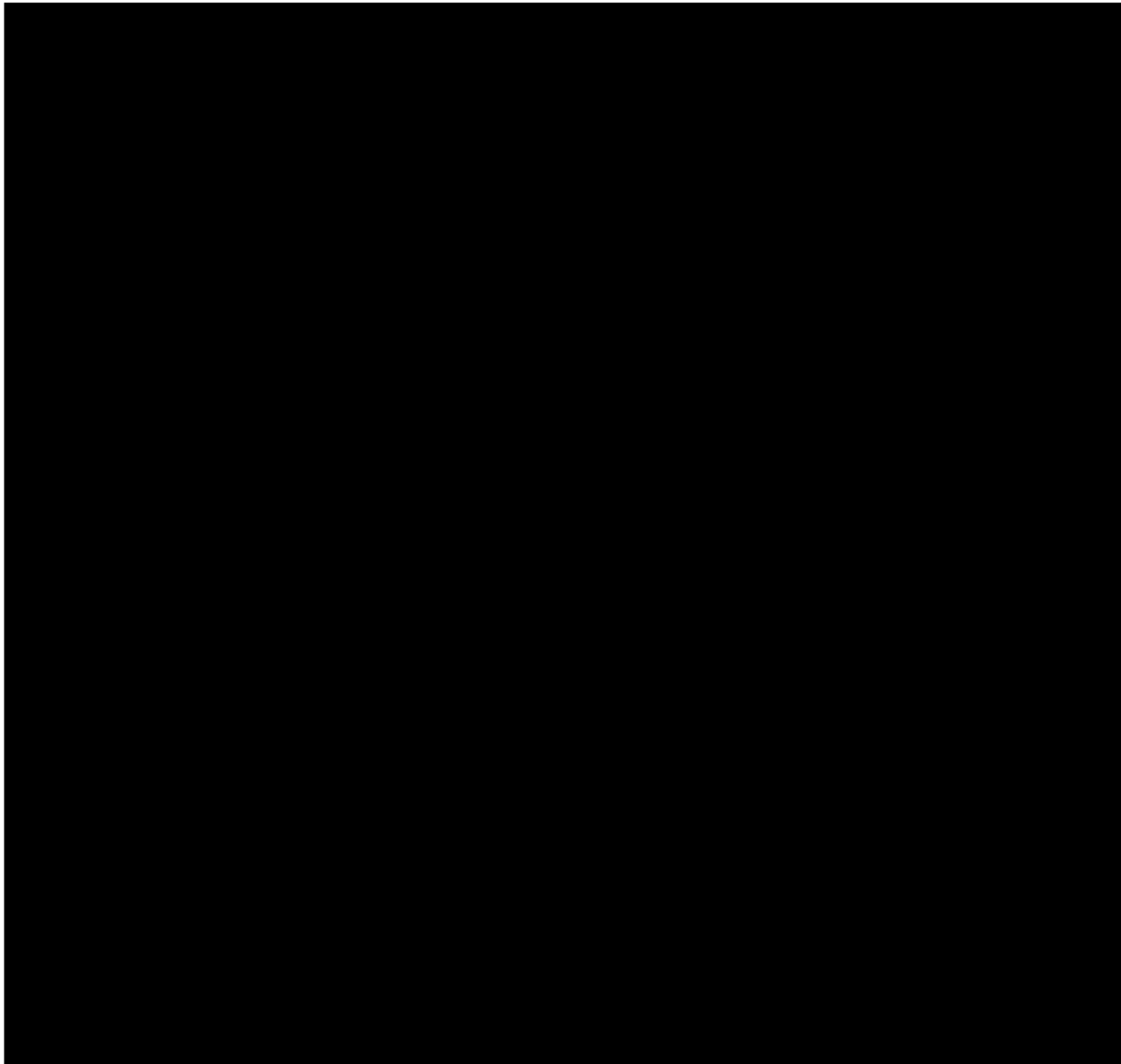
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Page 1 of 1



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7 Revision History Log

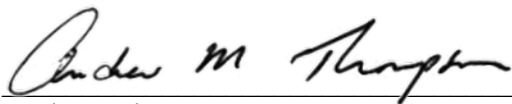
Date	Changes	Re v.	Originator	Approved by
5/18/2015	New Document Creation	A	N/A	Ming Chen
8/24/2015	Added new section 15 to mandate the verification records to be stored.	B	N/A	Ming Chen
9/21/2015	Added new section 10.n	C	N/A	Ming Chen
10/12/2015	Changed the Document Number to 090-WI-000-7316	D	N/A	Ming Chen
11/20/2015	Added section to Set Intervals and Configure for Scheduled Maintenance.	E	N/A	Ming Chen
3/8/2016	Added information to section 8.d	F	N/A	Ming Chen
4/13/2016	Added more details to section 14 through section 20.	G	N/A	Ming Chen
2/15/2018		H	N/A	Cliff Odom
10/10/2018		I	N/A	Cliff Odom
08/01/2019	5.3.2.2 Plant number replaced with Batch number; 5.4.1 Oxygen number replaced C=O/CF Ratio. Appendix A added.	M	Prakash Iyer	Brigitte Florschutz
12/16/2019		N	Brigitte Florschutz	Prakash Iyer
07/30/2020		O	Brigitte Florschutz	Prakash Iyer, Siddharth Athreya

CERTIFICATION STATEMENT FOR TSCA CBI CLAIMS

I hereby certify to the best of my knowledge and belief that all information claimed as TSCA CBI provided with this statement is complete and accurate. I also understand that I must submit a substantiation statement for any information which I claim to be TSCA CBI which is not exempt from the substantiation requirements.

I further certify that, pursuant to 15 U.S.C. § 2613(c) and 40 C.F.R. § 2.208, for all claims for confidentiality made with this submission, all information submitted to substantiate such claims is true and correct, and that it is true and correct that:

- i. My company has taken reasonable measures to protect the confidentiality of the information;
- ii. I have determined that the information is not required to be disclosed or otherwise made available to the public under any other Federal law;
- iii. I have a reasonable basis to conclude that disclosure of the information is likely to cause substantial harm to the competitive position of my company; and
- iv. I have a reasonable basis to believe that the information is not readily discoverable through reverse engineering.



Date: 2/8/21

Andrew Thompson

President & CEO

Inhance Technologies LLC

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